

Communications & Public Outreach – EMS Element 9.0					
EMS Procedure 9.0	Revision 11	Approval Signature:	Effective Date: Oct. 06, 2014		
Purpose:	The purpose of this procedure is to develop a formal program for all Communication and Public Outreach concerning the biosolids management program and EMS to all employees, other City Departments, farmers, customers, and all other interested parties.				
Scope:	This procedure applies to all communication concerning the biosolids value chain and all EMS elements.				
Definitions:	Interested Parties – Individuals or groups concerned with or affected by the environmental performance of Village Creek Water Reclamation Facility's biosolids management activities. These parties include customers, future customers, farmers/ranchers, regulators, government officials, local residents, the media, environmental groups, and the general public.				
	Internal Communication – Communication with employees and departments of the City of Fort Worth				
	Employees – Any individual directly employed by the City of Fort Worth including Village Creek Water Reclamation Facility, Fort Worth, Texas.				
	External Communication – Communication with corporations and individuals not directly employed by the City of Fort Worth, including companies contracted to do work for the City.				
Responsibility:	The following individuals are ultimately responsible for setting and implementing internal and external communications of the biosolids beneficial reuse/recycling program: Assistant Director (Pollution Control), Water Systems Superintendent, Water Department Public Information Officer, Biosolids EMS Manager, Biosolids EMS Coordinator and the Biosolids Manager (Contractor). However, the entire EMS Team, all wastewater staff, and the City's contractors are encouraged to give their input to the continued improvement of internal and external communications and Public Outreach Program of the biosolids value chain.				
Procedure:		Internal Communication			
	In order to update its employees on changes in legal requirements, policy, the Environmental Management System, and other important matters, the City maintains a relatively informal communication process within the Pollution Control Division and between other divisions and departments within the City. This also includes communication between the City and the Biosolids Contractor.				
	Information is transmitted to employees, between divisions, and between department and Contractor in any one of the following methods:				
	 Phone calls – It shall be the responsibility of the Biosolids EMS Manager (City) and the Biosolids Manager (Contractor) to make sure that they or designated 				

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staff members are available to receive phone calls at all times. The Biosolids EMS Coordinator shall maintain a list of important phone numbers for the Water Department, the Contractor, and other agencies as deemed necessary.

- Letters, memorandums, and faxes
- E-mail
- Staff meetings
- Presentations
- Internal Newsletters
- Intranet www.cfwnet.org This website is the City's internal website which provides detailed information and communication to City employees on a number of subjects such as; Existing regulatory standards, EMS Elements, EMS review and audit reports, the ACToday Report (daily communication report from the City Manager's office), Water Daily Report, standard forms, and other reference information of this type is available on the City's intranet. The IT/Administrative Services division regularly updates intranet information and communication as it is provided.

External Communication

As Element 6 discusses, the City and its Contractors have several methods in place for interactive two-way communication with interested parties. The City can use the following methods to provide continual access to information and to keep the public informed of Water Department and Biosolids EMS activities:

- City of Fort Worth Website: http://fortworthtexas.gov/water/ --The Water Department's IT/Administrative Services division maintains these sites to provide the public with accurate information dealing with the Department's activities, programs, and processes. The City of Fort Worth's EMS manual, annual progress reports, and audit results are posted on the Biosolids pages within the site. This allows interested parties the ability to review EMS documents at their discretion. An email address, biosolids@fortworthtexas.gov, was created in an effort to have inquiries and complaints forwarded from the website directly to City personnel within the biosolids program. Information regarding environmental health and safety is also available on the webpage to help address common questions/concerns (i.e. odors, stormwater runoff) regarding the land application of biosolids.
- "The City Page" The Fort Worth Star Telegram newspaper publishes a weekly one-page section that the City uses to communicate important information to the general public.
- Video "Biosolids Program Beneficial Recycling" The City and Renda Environmental have jointly produced a descriptive and informational video (12 minutes) describing the biosolids program. The video is available to the public upon request and has been widely distributed. In addition, Summeral Productions Inc. has produced a seven-minute documentary about Renda Environmental, which originally aired on the Discovery Channel. Both of these videos are used and available for presentations on the biosolids program.

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- **Industry Awards** The City awards industries for compliance with its environmental ordinances and for pollution prevention. These awards include:
 - ♦ Pretreatment Star Award— 1 year of 100% compliance
 - ♦ Pretreatment Associate Award— 2 years of 100% compliance
 - ♦ Pretreatment Partnership Award— 3-10 years of 100% compliance
 - ♦ Pretreatment Stewardship Award— 11+ years of 100% compliance
 - Pretreatment Pollution Prevention Award—significant strides in pollution prevention
- News Releases
- Newspaper Advertisements
- Billing Inserts
- Brochures, Pamphlets, and Posters

Regulatory Communication:

The Environmental/Regulatory Coordinator and the Biosolids EMS Manager are primarily responsible for tracking the current biosolids regulatory standards and EMS information respectively as discussed in Element 4.0. However, any employee can gather regulatory information from professional organizations, such as WEF, AWWA, WEAT, etc., contacts at local regulatory agencies, contractors and vendors. They then transmit this information to the Water Department's Regulatory/Environmental Coordinator Division, who tracks any developments in the regulations and transmits the developments back to the employees and other City Departments using the above listed internal and external communication methods.

City and Contractor Communication:

Communication between the City and its Contractors is a very important form of external communication. The relationship between the City of Fort Worth and the Biosolids Contractor is an example of good, effective communication.

- **Daily Communication:** The City's Biosolids EMS Manager administers the contract and is in direct contact with the Contractor on a daily basis.
- Biosolids Project Progress Meetings: In addition, the City conducts regularly scheduled (monthly) meetings with the Contractor. The parties discuss contract activities such as maintenance issues, land application schedules, odor complaints, upcoming meetings, and any other relevant biosolids topics. Outstanding CANs are also discussed at these meetings. These meetings are documented with minutes that provide a continuous record of the Biosolids Project progress. The completed report is retained on the VCWRF network.

Public Outreach Program:

The City and the Biosolids Contractor take a very active role in public participation and communication with interested parties. Specific activities are discussed in EMS Element 6, Public Participation. These activities are tracked/recorded in an additional binder entitled "Public Outreach Activities" located in the office of the EMS Coordinator. Annually (end of TPDES Sludge Year) the activities will be enumerated and summarized, with the summary sheet going into the "Public Outreach Activities" binder.

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Biosolids Complaints and Requests for Information:

As discussed in Element 6.0, addressing interested parties and the public's direct complaints, questions, and comments with regards to biosolids is a vital aspect of this biosolids program. Appendix 9a contains the procedure for Addressing Biosolids Complaints and Requests for Information. Refer to SOPs BSLD 07.001 and 07.002 for more information regarding procedures for handling complaints.

Complaints Submitted Via Email:

Citizens can submit a complaint to biosolids@fortworthtexas.gov. Detailed instructions on what to include in the complaint can be found on the *Biosolids Complaint*, *Annual Audit*, & *Environmental Health* & *Safety* webpage

(http://fortworthtexas.gov/water/info/default.aspx?id=65862&ekmensel=73b29971_1308_2386_65862_1). The information obtained from the emailed complaint will be used to complete the Biosolids Complaint Form and documented in the Biosolids Complaint Log. This procedure allows complaints, especially odor issues, to be directly forwarded to City personnel responsible for investigating complaint issues and allow for a more efficient complaint response. It also acts as a potential tool for collecting detailed information regarding odor issues to include in the odor monitoring history of land application sites.

References:

EMS Framework Guidance Manual: http://www.wef.org/Biosolids/

Code of Good Practice, (NBP): http://www.wef.org/Biosolids/

Manual of Good Practice for Biosolids, (NBP): http://www.wef.org/Biosolids/

Public Outreach Activities binder

City of Fort Worth Water Department website: http://www.fortworthgov.org/water

Element 4.0 Legal and Other Requirements Element 6.0 Public Participation in Planning Element 7.0 Roles and Responsibilities

Element 12.0 Documentation and Document Control

Attachments:

Biosolids Complaint Form (City) Biosolids Complaint Log (City)

Field Observation Report Form (City) Close-out Site Visit Form (City)

Biosolids Complaint Form (Contractor)

Site Visit Form (Contractor) Complaint Log (Contractor)



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Revi	ision #	Date	Revision Description	
	11	10/06/2014	Referred to SOPs BSLD 07.001 and 07.002 under Biosolids Complaints and Requests for Information section.	
	10	02/17/2014	Procedure updated to include new bicsolids@fortworthtexas.gov address, emailed complaint information, and reference to environmental health and safety info. on the City's webpage.	
	09	10/03/2013	Updated City and Contractor Communication and complaint procedure	
(08	08/05/2013	Updated references, included an attachments list	
(07	02/08/2012	Update internal communication procedures	
(06	07/29/2011	Update public participation program, typographical errors and internal/external communication	
(05	11/16/2010	Update responsibilities, references, as well as procedures in Appendix 9a	
	04	05/15/2008	Audit (YR2) 2007	
(03	06/29/2007	Audit (YR1) 2006	
	02	11/29/2004	2004 Issue	
	01	10/01/2004	Approval Draft	
	SR	01/30/2004	Issued for Status Review	

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APPENDIX 9a

Procedure for Addressing Biosolids Complaints and Requests for Information

- Citizens contact the City of Fort Worth Water Department's Public Information Office, Environmental Division, Village Creek Water Reclamation Facility (VCWRF), Biosolids Contractor, or the local office of the Texas Commission on Environmental Quality (TCEQ).
- 2. If the City departments are contacted the issue is directed to the Biosolids EMS Manager at VCWRF. If the Biosolids Contractor is contacted the issue is directed to the Biosolids Manager (Contractor).
- 3. The City's Biosolids EMS Manager and Contractor (Biosolids Manager) then discuss the issue and determine the appropriate action. If contact was made requesting information, the City and/or Biosolids Manager (Contractor) will transmit the requested information, such as EMS program basics, EMS updates, basic information on land application and the biosolids program, etc. within 10 working days unless the information is of such a nature that it must be obtained through the Freedom of Information Act.
- 4. If a complaint is filed by an interested third party the City and Biosolids Manager (Contractor) shall document it by filling out a complaint form.
- 5. The City and Biosolids Contractor shall discuss the complaint and the measures to be taken to adequately address the issue in a timely manner. This includes conducting land application site visits in response to things such as odor complaints.
- 6. If needed, the City and/or Biosolids Contractor shall follow up with the TCEQ and/or EPA to ensure no outstanding issues exist.
- 7. Complaints are closed and recorded in the City's Biosolids Complaint Log on the VCWRF network and hard/typed copies of the complaint are filed in the Biosolids Complaint Log Binder. The contractor records the complaint in the Contractor's Complaint Information database.
- 8. Templates attached:

Biosolids Complaint Log (City)
Biosolids Complaint Form (City)
Field Observation Report (City)
Close-Out Site Visit Form (City)
Biosolids Complaint Form (Contractor)
Site Visit Form (Contractor)
Complaint Log (Contractor)

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